

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

MDL NO. 16-2738 (FLW) (LGH)

*THIS DOCUMENT RELATES TO ALL CASES*

**PLAINTIFFS' CROSS NOTICE OF TAKING ORAL  
DEPOSITION OF JOHN B. MCKEEGAN**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, Plaintiffs, by and through the undersigned counsel, hereby cross-notice the videotaped deposition upon oral examination of John B. McKeegan in the above-referenced matter. A copy of the original deposition notice is attached as Exhibit A.

Plaintiffs reserve the right to take a supplemental (non-duplicative) deposition of John B. McKeegan as may be needed based upon the production of documents and other discovery to occur subsequent to the presently scheduled deposition.

The deposition will take place before a person authorized to administer oaths and will continue until completed at the following time:

**September 27, 2021, at 10:00 a.m. (EST) via ZOOM.**

The deposition will be videotaped before a certified court reporter and may be used for the purposes of discovery or for use by Plaintiff as evidence at trial, both. You are invited to appear and take part in the examination as you deem appropriate.

Dated: September 26, 2021

Respectfully submitted,

/s/ Michelle A. Parfitt

MICHELLE A. PARFITT  
Ashcraft & Gerel, LLP  
4900 Seminary Road, Suite 650  
Alexandria, Virginia 22311  
703-931-5500  
[mparfitt@ashcraftlaw.com](mailto:mparfitt@ashcraftlaw.com)

/s/ P. Leigh O'Dell

P. LEIGH O'DELL  
Beasley, Allen, Crow, Methvin, Portis & Miles, P.C  
218 Commerce Street  
Montgomery, Alabama 36104  
334-269-2343  
[leigh.odell@beasleyallen.com](mailto:leigh.odell@beasleyallen.com)

/s/Christopher M. Placitella

Christopher M. Placitella  
COHEN, PLACITELLA & ROTH, P.C.  
127 Maple Avenue  
Red Bank, NJ 07701  
732-747-9003  
[cplacitella@cprlaw.com](mailto:cplacitella@cprlaw.com)

ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that on September 26, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ P. Leigh O'Dell

P. LEIGH O'DELL  
Beasley, Allen, Crow, Methvin, Portis & Miles, P.C  
218 Commerce Street  
Montgomery, Alabama 36104  
334-269-2343  
[leigh.odell@beasleyallen.com](mailto:leigh.odell@beasleyallen.com)

ATTORNEY FOR PLAINTIFFS

# Exhibit A

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI**

**VICKIE FORREST**, et al.,

Plaintiffs,

vs.

**JOHNSON & JOHNSON**, et al.,

Defendants

Case No. 1522-CC00419-02

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**PLAINTIFFS' AMENDED NOTICE OF TAKING REMOTE ORAL AND VIDEOTAPED  
TRIAL DEPOSITION OF JOHN B. MCKEEGAN**

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TO:	Counsel of Record
DATE AND HOUR:	September 27, 2021 at 10:00 a.m. EST
WITNESS TO BE DEPOSED:	John B. McKeegan
STYLE OF DEPOSITION:	Steno & Video
COURT REPORTER:	<b>Golkow Court Reporting</b>

PLEASE TAKE NOTICE that, pursuant to Rule 57 of the Missouri Rules of Civil Procedure, the Plaintiffs, by and through undersigned counsel, will conduct the remote videotaped deposition upon oral examination before a person authorized to administer oaths, of John B. McKeegan in the above-referenced matter. The deposition will be conducted remotely; a zoom link will be circulated in advance of the deposition. The deponent and all persons wishing to attend the deposition shall provide counsel for Plaintiffs with their email addresses no later than three days before the deposition. The deposition will continue day-to-day until completed.

The deposition will be videotaped before a certified court reporter from Golkow Court Reporting, 877-370-3377, and may be used for the purposes of discovery or for use by Plaintiffs as evidence at trial, or both.

Dated: September 21, 2021

**ONDERLAW, LLC**

By: /s/ W. Wylie Blair  
James G. Onder, #38049  
W. Wylie Blair, #58196  
Stephanie L. Rados, #65117  
110 E. Lockwood, 2<sup>nd</sup> Floor  
St. Louis, MO 63119  
314-963-9000 telephone  
314-963-1700 facsimile  
[onder@onderlaw.com](mailto:onder@onderlaw.com)  
[blair@onderlaw.com](mailto:blair@onderlaw.com)  
[rados@onderlaw.com](mailto:rados@onderlaw.com)

OF COUNSEL:

R. Allen Smith, Jr. – MSB # 99984  
THE SMITH LAW FIRM, PLLC  
681 Towne Center Boulevard, Suite B  
Ridgeland, Mississippi 39157  
Telephone: (601) 952-1422  
Facsimile: (601) 952-1426

Timothy W. Porter – MSB # 9687  
Patrick C. Malouf – MSB # 9702  
John T. Givens – MSB #101561  
PORTER & MALOUF, PA  
Post Office Box 12768  
Jackson, Mississippi 39236-2768  
Telephone: (601) 957-1173  
Facsimile: (601) 957-7366

Ted G. Meadows – ALB # MEA014  
BEASLEY, ALLEN, CROW,  
METHVIN, PORTIS & MILES, P.C.  
218 Commerce Street  
Post Office Box 4160  
Montgomery, Alabama 36103

Telephone: (334) 269-2343  
Facsimile: (334) 954-7555

Michelle A. Parfitt, DC Bar No. 358592  
James F. Green, DC Bar No. 214965  
Patrick K. Lyons, DC Bar No. 1034531  
Adam K. Rosen, DC Bar No. 1601619  
Ashcraft & Gerel, LLP  
4900 Seminary Road, Suite 650  
Alexandria, Virginia 22311  
Telephone: (703) 931-5500  
Facsimile: (703) 820-1656

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this document was filed and electronically served by way of the Court's electronic filing system this 21st day of September, 2021.

/s/ W. Wylie Blair